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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

JOHN CHAPMAN STOLLER, individually and in his  
capacity as Grantor and Trustee of the John Chapman  
Stoller Revocable Trust dtd 10/5/1988; SHEILA  
PATRICIA STOLLER, individually and in her  
capacity as Trustee of the John Chapman Stoller  
Revocable Trust dtd 10/5/1988; and JOHN

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04714 (SMB)

CHAPMAN STOLLER REVOCABLE TRUST DTD  
10/5/1988,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Defendants John Chapman Stoller, individually and in his capacity as Grantor and Trustee of the John Chapman Stoller Revocable Trust dtd 10/5/1988, Sheila Patricia Stoller, individually and in her capacity as Grantor and Trustee of the John Chapman Stoller Revocable Trust dtd 10/5/1988, and John Chapman Stoller Revocable Trust dtd 10/5/1988, appearing *pro se*, (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed and served the Complaint against Defendants.
2. On May 16, 2011, Defendants served an answer on the Trustee.
3. On January 20, 2017 the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

New York, New York  
February 21, 2017

By: /s/ Nicholas J. Cremona  
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Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

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*Pro se*

By: /s/ Sheila Patricia Stoller  
Sheila Patricia Stoller  
Cowpens Fonthill Gifford Salisbury  
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United Kingdom

*Pro se*

By: /s/ John Chapman Stoller and Sheila Patricia  
Stoller, Trustees  
JOHN CHAPMAN STOLLER REVOCABLE  
TRUST DTD 10/5/1988

*Pro se*

SO ORDERED

Dated: February 21<sup>st</sup>, 2017  
New York, New York

/s/ STUART M. BERNSTEIN  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE